

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE:**

**MYRIAM MARIA ROMAN SANTIAGO  
(DEBTOR)**

**CASE NO. 09-06913 (SEK)**

**CHAPTER 13**

**INFORMATIVE MOTION  
(POST CONFIRMATION MODIFIED PLAN DATED 04/04/2011)**

**TO THE HONORABLE COURT:**

Comes now Debtor, represented by the undersigned attorney, and represents as follows:

1. Debtor informs of the separate filing of Post Confirmation Modified Plan:

a. Post Confirmation Modified Plan: to increase base to cure post petition mortgage payments arrears and to include attorney's fees provision and treatment for the arrears.

**WHEREFORE**, Debtor prays from this Honorable Court to take notice and allow filing of the post confirmation modified plan.

**RESPECTFULLY SUBMITTED.**

**NOTICE:** Within twenty eight (28) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

**CERTIFICATE OF SERVICE:** I hereby certify that on this same date I electronically filed the above document with the Clerk of the Court using the CM/ECF System which will send a notification of such filing to all C/MECF participants in this case, including: U.S. Trustee, and to the Assistant U.S. Trustee. Furthermore, I hereby certify that I mailed this document by First Class Mail postage prepaid to the non CM/ECF participants included in the attached master address list.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, April 4, 2011.

s/JOSE L. JIMENEZ QUINONES

José L. Jiménez Quiñones, Esq.

USDCPR 203808

268 AVE. PONCE DE LEON

Suite 1118

San Juan, P.R. 00918-2007

TEL: 787-282-9009

FAX: 1 (866) 326-9416

jimenezlawoffice@gmail.com

United States Bankruptcy Court  
District of Puerto Rico

IN RE:

Case No. 09-06913

ROMAN SANTIAGO, MYRIAN MARIA

Chapter 13

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: 4/04/2011

☐ AMENDED PLAN DATED: \_\_\_\_\_

☐ PRE ☒ POST-CONFIRMATION

Filed by: ☐ Debtor ☐ Trustee ☐ Other

I. PAYMENT PLAN SCHEDULE

\$ 500.00 x 60 = \$ 30,000.00  
\$ \_\_\_\_\_ x \_\_\_\_\_ = \$ \_\_\_\_\_  
\$ \_\_\_\_\_ x \_\_\_\_\_ = \$ \_\_\_\_\_  
\$ \_\_\_\_\_ x \_\_\_\_\_ = \$ \_\_\_\_\_  
\$ \_\_\_\_\_ x \_\_\_\_\_ = \$ \_\_\_\_\_

TOTAL: \$ 30,000.00

Additional Payments:

\$ 96,000.00 to be paid as a LUMP SUM  
within 24 months with proceeds to come from:

☒ Sale of Property identified as follows:  
**COMMERCIAL PROPERTY AT DORADO, PR &  
EQUIPMENT USED FOR THE  
RESTAURANT-BAR AND RENTAL BUSINESS.**

☐ Other:

Periodic Payments to be made other than, and in  
addition to the above:

\$ \_\_\_\_\_ x \_\_\_\_\_ = \$ \_\_\_\_\_

PROPOSED BASE: \$ 126,000.00

III. ATTORNEY'S FEES  
(Treated as § 507 Priorities)

Outstanding balance as per Rule 2016(b) Fee  
Disclosure Statement: \$ 1,274.00

Signed: /s/ MYRIAN MARIA ROMAN SANTIAGO  
Debtor

Joint Debtor

II. DISBURSEMENT SCHEDULE

A. ADEQUATE PROTECTION PAYMENTS OR \$ 225.00

B. SECURED CLAIMS:

☐ Debtor represents no secured claims.

☒ Creditors having secured claims will retain their liens and shall be paid as follows:

1. ☒ Trustee pays secured ARREARS:

Cr. <u>BPPR</u>	Cr. <u>ISLAND FINANCE</u>	Cr. _____
# <u>XXXXXXXX4812559</u>	# <u>1903 pre &amp; post</u>	# _____
\$ <u>8,417.36</u>	\$ <u>16,445.03</u>	\$ _____

2. ☒ Trustee pays IN FULL Secured Claims:

Cr. <u>FIRST BANK</u>	Cr. _____	Cr. _____
# <u>XXXXX7110</u>	# _____	# _____
\$ <u>26,954.90</u>	\$ _____	\$ _____

3. ☐ Trustee pays VALUE OF COLLATERAL:

Cr. _____	Cr. _____	Cr. _____
# _____	# _____	# _____
\$ _____	\$ _____	\$ _____

4. ☐ Debtor SURRENDERS COLLATERAL to Lien Holder:

5. ☐ Other:

6. ☒ Debtor otherwise maintains regular payments directly to:

<u>R&amp;G MORT</u>	<u>BPPR</u>	<u>ISLAND FINANCE</u>
---------------------	-------------	-----------------------

C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.  
11 U.S.C. § 507 and § 1322(a)(2)

D. UNSECURED CLAIMS: Plan ☐ Classifies ☒ Does not Classify Claims.

1. (a) Class A: ☐ Co-debtor Claims / ☐ Other: \_\_\_\_\_  
☐ Paid 100% / ☐ Other: \_\_\_\_\_

Cr. _____	Cr. _____	Cr. _____
# _____	# _____	# _____
\$ _____	\$ _____	\$ _____

2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)  
**See Continuation Sheet**

Attorney for Debtor JIMENEZ - QUINONES LAW OFFICES

Phone: (787) 282-9009

Debtor(s)

**AMENDED CHAPTER 13 PAYMENT PLAN**  
**Continuation Sheet - Page 1 of 2**

	Cr	#	\$
Executory Contracts - Assumed:	CARLOS MEDINA		
	ILVA BERRIOS MON		
	IVAN MARTINEZ TOF		
	JOHN DOE		
	JOHN SMITH		
	JOSE C. RAMOS MO		
	JOSE E. MORALES		
	MARANGELI DEL VA		
	VALERY MOLINA RC		

**AMENDED CHAPTER 13 PAYMENT PLAN****Continuation Sheet - Page 2 of 2**

1. ISLAND FINANCE'S POST PETITION ARREARS WILL BE CURED AS FOLLOWS, DEBTOR WILL PAY \$9,000.00 DIRECTLY TO SAID CREDITOR:
  - a. \$3,000.00 ON/BEFORE APRIL 12, 2011
  - b. \$3,000.00 ON/BEFORE MAY 12, 2011
  - c. \$3,000.00 ON/BEFORE JUNE 12, 2011
2. DEBTOR WILL RESUME MONTHLY DIRECT PAYMENTS IN APRIL, 2011. THE REMAINING BALANCE OF \$5,244.03 WILL BE CURED THROUGH THIS POST CONFIRMATION MODIFIED PLAN.
3. R&G MORTGAGE (POC #3-1) WILL BE PAID IN-FULL, DIRECTLY, UPON SALE OF PROPERTY WITHIN 24 MONTHS OF FILING, OTHERWISE, THE STAY WILL BE LIFTED.
4. INSURANCE WILL BE PROVIDED TO SECURED AUTOMOBILE LIENHOLDER FIST BANK (POC #6) THROUGH A TRUSTEE APPROVED INSURER UPON MATURITY DATE OF ORIGINAL CONTRACT (MAY 31, 2014) IF NECESSARY, DEBTORS ESTIMATE THAT THIS CLAIM WILL HAVE BEEN PAID IN FULL WITHIN THE FIRST 24 MONTHS OF THE PLAN, BEFORE THE INSURANCE HAS ELAPSED. THIS SECURED CREDITOR WILL BE PAID AHEAD OF OTHER SECURED CREDITORS DUE TO ACCELERATED DEPRECIATION OF ITS COLLATERAL. PRE CONFIRMATION ADEQUATE PROTECTION PAYMENTS WILL BE PAID TO THIS CREDITOR UPON FILING OF THE ITS CLAIM AND UP TO CONFIRMATION OF THE PLAN IN THE AMOUNT OF \$225.00 PER MONTH.
5. GENERAL UNSECURED CREDITORS' CLAIMS SHALL RECEIVE PAYMENT OF 100% + 6 % PRESENT VALUE INTEREST.
6. THE PLAN INCLUDE \$350.00 ATTORNEY'S FEES FOR THE PCM.

ROMAN SANTIAGO MYRIAN MARIA  
URB HACIENDA DEL DORADO  
G-5 INDIA LAUREL  
TOA ALTA PR 00953

CRIM  
PO BOX 195387  
SAN JUAN PR 00918-5387

ISLAND FINANCE  
DRIVE IN PLAZA LOCAL  
BAYAMON PR 00960

JIMENEZ - QUINONES LAW OFFICES  
268 PONCE DE LEON STE 1118  
SAN JUAN PR 00918-2007

DEPARTAMENTO DE HACIENDA  
PO BOX 9024140 OFICINA 424-B  
SAN JUAN PR 00902-4140

IVAN MARTINEZ TORRES  
LESSOR  
CARR 872 KM 10 RIO PLANTATION HT  
BAYAMON PR 00961

AEE  
ANKRUPTCY CLAIMS OFFICE  
PO BOX 364267  
SAN JUAN PR 00936

FIA CARD SERVICES  
PO BOX 15026  
WILMINGTON DE 19850-5026

JOHN DOE  
47-13 CALLE 41 URB SIERRA BAYAMON  
APT2  
BAYAMON PR 00961

ASOC DE RESIDENTES HACIENDA DEL  
DORADO  
PO BOX 4069  
BAYAMON PR 00958

FIA CARD SERVICES  
PO BOX 15720  
WILMINGTON DE 19850-5720

JOHN SMITH  
LESSOR  
CARR 872 KM 10 RIO PLANTATION HT  
BAYAMON PR 00961

BANCO POPULAR DE PR  
PO BOX 71375  
SAN JUAN PR 00936-7077

FIA CARD SERVICES  
1110 NORTH KING STREET  
WILMINGTON DE 19801

JOSE C RAMOS MORALES &  
MYRNA ORTIZ CARMONA - LESSORS  
47-13 CALLE 41 URB SIERRA BAYAMON  
APT1  
BAYAMON PR 00961

BERRIOS  
EMPRESAS BERRIOS INC  
PO BOX 674  
CIDRA PR 00739-0674

FIRST BANK  
PO BOX 13817  
SAN JUAN PR 00908-3817

JOSE E MORALES  
LESSOR  
47-13 CALLE 41 URB SIERRA BAYAMON  
APT4  
BAYAMON PR 00961

BPPR  
BANCO POPULAR DE PR  
PO BOX 362708  
SAN JUAN PR 00936-2708

HOME DEPOT CREDIT SERVICES  
C/O CITI CARDS  
PO BOX 689106  
DES MOINES IA 50368-9106

LCDO JUAN C VILLANUEVA LOPEZ  
PO BOX 10441  
SAN JUAN PR 00922

CARLOS MEDINA  
LESSOR  
47-13 CALLE 41 URB SIERRA BAYAMON  
APT3  
BAYAMON PR 00961

ILVA BERRIOS MONTESINO  
LESSOR  
47-13 CALLE 41 URB SIERRA BAYAMON  
APT5  
BAYAMON PR 00961

LVNV FUNDING LLV  
RESURGENT CAPIOTAL SERVICES  
PO BOX 10587  
GREENVILLE SC 29603-0587

CITIFINANCIAL PLUS  
JARDINES DE TOA ALTA  
TOA ALTA PR 00953

INTERNAL REVENUE SERVICES  
PO BOX 21126  
PHILADELPHIA PA 19114

MARANGELI DEL VALLE  
LESSOR  
CARR 872 KM 10 RIO PLANTATION HT  
BAYAMON PR 00961

CITIFINANCIAL PLUS  
AVENIDA LOS DOMINICOS  
TOA ALTA PR 00953

ISLAND FINANCE  
ORIENTAL BANK GROUP BUILDING  
998 CALLE SAN ROBERTO STE 3000  
SAN JUAN PR 00926

PREFERRED HOME SERVICES INC  
PO BOX 4069  
BAYAMON PR 00958-1069

R & G MORTGAGE CORPORATION  
DIVISION LEGAL  
EDIF VIG TOWER 1225 PONCE DE LEON  
AVE  
SANTURCE PR 00907

TREASURY SECRETARY  
DEPARTAMENTO DE HACIENDA  
PO BOX 9024140  
SAN JUAN PR 00902-4140

R&G MORT  
R & G MORTGAGE CORPORATION  
PO BOX 362394  
SAN JUAN PR 00936-2394

UNIVERSAL FIDELITY CORPORATION  
PO BOX 941911  
HOUSTON TX 77094-8911

RMS  
PO BOX 4836  
RICHFIELD OH 44286

VALERY MOLINA RODRIGUEZ  
LESSOR  
CARR 872 KM 10 RIO PLANTATION HT  
BAYAMON PR 00961

SAMS DISCOVER  
PO BOX 960013  
ORLANDO FL 32896-0013

WASTE MANAGEMENT  
PO BOX 594  
CAGUAS PR 00726-0594

SANTANDER FINANCIAL  
PO BOX 362589  
SAN JUAN PR 00936-2589

SEARS  
CARD SERVICE CENTER  
PO BOX 6283  
SIOUX FALLS SD 57117-6283

T MOBILE  
12920 SE 38TH STREET  
BELLEVIEW WA 98006

TMCPR  
TOYOTA MOTOR CREDIT DE PUERTO  
RICO  
PO BOX 71410  
SAN JUAN PR 00936-8510

TOYOTA CREDIT DE PUERTO RICO  
PARQUE LAS AMERICAS I SUITE 501  
235 CALLE FEDERICO COSTAS  
SAN JUAN PR 00936-8510

TOYOTA FINANCIAL SERVICES  
PO BOX 71410  
SAN JUAN PR 00936-8510